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8 Attorneys for Bank of the West

Honorable Frederick C. Corbit
Chapter 11
EX-PARTE

6 FOSTER GARVEY PC
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11 UNITED STATES BANKRUPTCY COURT
12 FOR THE EASTERN DISTRICT OF WASHINGTON

13 In Re:

14 COUNTRY MORNING FARMS, INC. and
15 COUNTRY MORNING FARMS CATTLE,
16 LLC,

Debtors/Debtors in Possession.

Lead Case No. 19-00478-FPC11

Jointly Administered

**EX -PARTE MOTION FOR 2004
EXAMINATION OF GAYLE NOYES**

18 COMES NOW Bank of the West ("BOTW"), a secured creditor in this case and hereby
19 moves this Court pursuant to Fed. R. Bankr. P. 2004 and 9016 (incorporating Fed. R. Civ. P.
20 45) for an order directing Gayle Noyes as Dairy Manager to debtor Country Morning Farms,
21 Inc., to appear at the offices of Foster Garvey PC, 618 West Riverside Avenue, Suite 300,
22 Spokane, WA 99201 on **December 11, 2019 at 10:00 a.m.**, or at another time set by written
23 agreement, to be examined under oath concerning the acts, conduct, property, liabilities and
24 financial condition of the Debtor, and any other matter which may affect the Debtor's estate,
25 including but not limited to the Debtor's proposed Plan of Reorganization.
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E-PARTE MOTION - 1

FOSTER GARVEY PC
1111 THIRD AVENUE, SUITE 3000
SEATTLE, WASHINGTON 98101-3292
PHONE (206) 447-4400 FAX (206) 447-9700

1 Dated: November 21, 2019.

2 **FOSTER GARVEY PC**

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4 By: /s/ Deborah A. Crabbe
5 Deborah A. Crabbe, WSBA #22263
6 Attorneys for Creditor Bank of the West
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E-PARTE MOTION - 2

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